

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of

Distribution of the
2015 Satellite Royalty Funds

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)
)
) Docket No. 17-CRB-0011-SD (2015)
)
)

**DEVOTIONAL CLAIMANTS' REPLY TO MULTIGROUP CLAIMANTS' OBJECTION
TO PARTIAL DISTRIBUTION OF 2015 SATELLITE ROYALTY FUNDS TO
CERTAIN ALLOCATION PHASE CLAIMANTS**

Pursuant to the Judges' *Notice Requesting Reply Comments*, 92 Fed. Reg. 45624 (Sept. 29, 2017), the Devotional Claimants¹ hereby reply to "Multigroup Claimants' Objection to Partial Distribution of 2015 Satellite Copyright Royalties Funds to Certain "Allocation Phase Claimants'" ("MGC's Objection") filed on May 17, 2017.

¹ In this proceeding, the Devotional Claimants consist of the following copyright owners and claimants: The Christian Broadcasting Network, Inc.; Crystal Cathedral Ministries, Inc.; Living Church of God (International), Inc.; Living Word Christian Center (a/k/a Bill Winston Ministries); Philadelphia Church of God, Inc.; Liberty Broadcasting Network, Inc.; In Touch Ministries, Inc.; Turning Point for God; Christian Television Corporation, Inc. and its owned or subsidiary television station entities; Messianic Vision, Inc.; American Religious Town Hall, Inc.; Billy Graham Evangelistic Association; Crenshaw Christian Center; It Is Written; Joel Osteen Ministries, Inc., a/k/a Lakewood Church; Kerry Shook Ministries, a/k/a Fellowship of the Woodlands; Joyce Meyer Ministries, Inc. f/k/a Life In The Word, Inc.; John Hagee Ministries, Inc.; and Word of God Fellowship, Inc., d/b/a Daystar Television Network. See Exhibits 1 and 2.

I. Background

The Allocation Phase Parties, including the Devotional Claimants, filed a motion for partial distribution of the 2015 Satellite Funds (the “Motion”) on February 17, 2017. The Judges published a notice in the Federal Register on April 17, 2017, seeking comments on the Motion. 82 Fed. Reg. 18161 (April 17, 2017). Two individuals, Multigroup Claimants (“MGC”) and David Powell, filed comments.² The Judges have granted the Allocation Phase Parties, including the Devotional Claimants, the opportunity to reply to the comments.

II. MGC Has Not Raised a Reasonable Objection to Partial Distribution of 2015 Satellite Funds

MGC’s Objection challenges partial distribution of 2015 Satellite Funds to two of the Allocation Phase Parties, Devotional Claimants and Program Suppliers, but concedes there is no objection to partial distribution to the other Allocation Phase Parties. MGC’s Objection elides over the fact that the Motion, similar to other partial distribution motions in the past, does not seek partial distribution to any particular Allocation Phase Parties, but rather seeks a single partial distribution to the Office of the Commissioner of Baseball as common agent of all Allocation Phase Parties (the “Common Agent”). Therefore, even if the Judges find that a reasonable objection might have existed as to a partial distribution to Program Suppliers or to Devotional Claimants as such, that is not the case before them. The issue before the Judges is

² Mr. Powell’s objection is generally incomprehensible and, therefore, not reasonable on its face. It appears he has a complaint against BMI (Music) regarding a “refusal to deal” and “issue of license.” Neither of these assertions (which lack underlying factual and legal support) constitute “reasonable grounds” to deny the Motion. *See Order Granting Motion for Partial Distribution*, Dkt. No. 16-CRB-0020 CD (2015) (denying virtually identical objection of Mr. Powell to motion for partial distribution of 2015 cable royalties) (June 6, 2017). The Devotional Claimants see no reason to make further comment on Mr. Powell’s filing.

whether MGC has stated a reasonable objection to a partial distribution to the Office of the Commissioner of Baseball as common agent of all Allocation Phase Parties. MGC has not even addressed this issue.

But even setting this issue aside, MGC presents no reasonable objection to a partial distribution to the Devotional Claimants:

(a) MGC's assertion that he does not know the identity of the Devotional Claimants, "whoever they are," is disingenuous. MGC Objection at 3. It would be like the Devotional Claimants referring to MGC as "Multigroup Claimants, if that is his real name ...," when we know perfectly well at this point that his real name is Alfred Galaz, father of Independent Producers Group founder Raul Galaz and majority owner Denise Vernon.³

(b) MGC's assertion that Devotional Claimants are not "established claimants" ignores reality, as the Devotional Claimants have received final satellite distributions for every royalty year from 1989 through 1998, have received partial distributions for every royalty year from 1999 through 2014, and have received final distribution in a contested satellite royalty proceeding for royalty year 2008. The statutory standard is whether an objection is reasonable. By any "reasonable" standard, the Devotional Claimants have an established "track record of final distribution allocations." *See Order Granting in Part and Denying in Part IPG's Motion for Partial Distribution of Program Suppliers' Royalties*, No. 2012-6 CRB CD 2004-09 (Phase II), Sep. 29, 2016, at 2 (quoting *Order Denying IPG Motion For Partial Distribution*, Nos. 2008-2 CRB CD 2000-03 (Phase II), *etc.*, Feb. 11, 2014, at 4-5.

³ Alfred Galaz also goes by the assumed name "Spanish Language Producers," and has previously been known under the assumed name "Segundo Suenos." *See Galaz v. Galaz*, 850 F.3d 800, 803 (5th Cir. 2017).

A. Devotional Claimants Are Publicly Identified, Known to MGC, and Fully Competent to Repay any Overpayment Occasioned by the Partial Distribution

MGC's first objection to a partial distribution to Devotional Claimants is grounded on the argument that it has no means to determine the identity of the Devotional Claimants, and thus MGC cannot determine who would guarantee repayment of any over-advanced royalties. MGC Objection at 3. MGC's assertions are unreasonable and are not a basis to deny the partial distribution.

In every satellite royalty proceeding addressed by the Judges and their predecessors (Copyright Royalty Tribunal and Copyright Arbitration Royalty Panels), the Devotional Claimants have actively participated and have received final or partial awards. In fact, the original religious copyright owners referred to themselves as the Devotional Claimants in contrast to the other program category representatives. After Independent Producers Group ("IPG") emerged as a putative representative of other religious program producers, the Devotional Claimants also identified themselves as Settling Devotional Claimants ("SDC") to be distinguished from IPG, when disputes arise in the Devotional program category.

As the record in the 2010-2013 proceeding establishes, MGC is an assumed name for Alfred Galaz, father of Raul Galaz (founder of IPG) and Denise Vernon (principal owner of IPG). Like IPG, MGC is represented by Brian Boydston. Mr. Boydston has dealt with the Devotional Claimants and their counsel for many years, in cable and satellite royalty proceedings, including the 1999 Cable Royalty Distribution Proceeding, the 2000-2003 Cable Royalty Distribution Proceeding, the 1999-2009 Satellite and 2004-2009 Cable Consolidated Royalty Distribution Proceeding, and the 2010-2013 Cable and Satellite Consolidated Royalty

Distribution Proceeding. In short, it is disingenuous, to say the least, for MGC to claim “[t]here is no means to determine the identity of ... the ‘Devotional Claimants.’” MGC’s Objection at 3. A simple telephone call or email from Mr. Boydston to counsel for the Devotional Claimants would have readily allowed MGC to learn the identity of the particular Devotional Claimants for 2015 Satellite Funds. However, neither Mr. Boydston nor MGC made any such effort. The Devotional Claimants submit that MGC’s failure to inquire renders this objection unreasonable.

Furthermore, even absent such inquiry, the specific identity of Devotional Claimants is publicly available. The Judges’ 2015 listing of Satellite Claims (attached hereto as Exhibit 1) and the claims as filed (which can be obtained directly from the Copyright Royalty Board on request), provide a ready, publicly-available means to verify the identity of the entities that filed the Devotional claims. A list of the Devotional Claimants and their claim numbers are set forth in Exhibit 2. All identified Devotional Claimants have filed satellite royalty claims with the Copyright Royalty Board previously and have qualified for partial distributions ordered by the Judges.⁴ In all such instances, the Judges ruled that no reasonable objection was stated to deny the Devotional Claimants participation in a partial distribution.

⁴ See e.g. *Order Granting Phase I Claimants’ Motion for Partial Distribution of 2010 Satellite Royalty Funds*, Docket No. 2012-5 CRB 2010 SD (Sept. 18, 2012); *Order Granting Phase I Claimants’ Motion for Partial Distribution of 2011 Satellite Royalty Funds*, Docket No. 2012-10 CRB SD 2011 (Mar. 13, 2013); *Order Granting Motion of Phase I Claimants for Partial Distribution of 2012 Satellite Royalty Funds*, Docket No. 14-CRB-0008 SD (2010-2012) (March 3, 2015); *Order Granting Motion of Phase I Claimants for Partial Distribution of 2013 Satellite Royalty Funds*, Docket No. 14-CRB-0011 SD (2013) (May 28, 2015); *Order Granting Motion for Partial Distribution*, Docket No. 16-CRB-0010 SD (2014) (Aug. 24, 2016); see also “Motion of the Allocation Phase Parties for Partial Distribution of 2015 Satellite Royalty Funds,” Docket No. 17-CRB-0011-SD (2015) at 3-5 (filed Feb. 17, 2017).

MGC's related concern that it is worried about repayment of over-advanced funds is equally unreasonable. The partial distribution 2015 Satellite Funds will be deposited with the Common Agent for the Allocation Phase Parties, with assurance to the Library of Congress, Copyright Office, as required by statute, that any over-payment of funds (plus interest) will be returned. For their part, the Devotional Claimants are among the most substantial and reputable religious ministries in the country, and they are committed to and capable of making any repayment (plus interest) that might be attributed to their share and required by a final determination. As a result, MGC's first basis to deny this partial distribution is not reasonable.

B. Devotional Claimants Have Received Full or Partial Distributions in Every Satellite Proceeding, and MGC's Objection on Grounds that the Devotional Claimants are Not "Established Claimants" is Unreasonable

MGC's second argument is that because there has been no final distribution of satellite royalties, the Devotional Claimants are not "established claimants" in satellite proceedings, and, therefore, they should be denied the partial distribution. As with MGC's other objection, this assertion is without basis, and not reasonable grounds to deny the Motion.

First, the Devotional Claimants have received final distributions in satellite royalty distribution proceedings for every royalty year from 1989 through 1998. Moreover, the Devotional Claimants, comprised of the SDC, have received partial distributions in all satellite royalty distribution proceedings for every royalty year from 1999 through 2014.

Second, in further contradiction of MGC's Objection, the SDC have in fact prevailed in contested proceedings for satellite funds. For 2008 satellite royalty funds, the Judges determined that 100% of the satellite funds should be awarded to the SDC, and have ordered final

distribution. *Order Granting Final Distribution of 2008 Satellite Royalties for the Devotional Category*, Dkt. No. 2012-7 CRB SD 1999-2009 (Phase II) (Dec. 22, 2015); *Order Directing Final Distribution of 2008 Satellite Royalties for the Devotional Category*, Dkt. No. 2012-7 CRB SD 1999-2009 (Phase II) (Jan. 13, 2016).

To overcome this decisive history of final and partial distributions, which fatally undercuts MGC's contention, MGC refers to the *Order Granting In Part and Denying in Part IPG's Motion for Partial Distribution of Program Suppliers' Royalties*, Dkt. No. 2012-7 CRB SD 1999-2009 (Phase II) (Sept. 29, 2016) ("*2016 Order*"). MGC's Objection at 4-7. However, this Order does not support denial of the Motion. That ruling applied to a contested motion for partial distribution filed by IPG in connection with a Phase II case, not a joint motion by all Phase I or Allocation Phase Parties. An established track record of achieving partial or final distributions through years of Phase I or Allocation Phase settlements is sufficient to satisfy the statutory standard and the Judges' precedents.

It is noteworthy that in the 2016 Order, the Judges indicated that even though IPG-represented claimants had not received a final distribution of satellite royalties, a compromise with MPAA might have put IPG on "firmer footing" for a partial distribution. *2016 Order* at 10, n.11. The statutory standard for rejection of a partial distribution is, inter alia, "that no claimant entitled to receive such fees has stated a *reasonable objection* to the partial distribution." 17 U.S.C. §801(b)(3)(C) (emphasis supplied). While the Judges have relied on the "established claimant" standard as a factor in evaluating the reasonableness of an objection to partial distributions, that test is in service to, and not in derogation of, the "reasonableness" requirement

dictated by the statute. It is merely a reliable benchmark for measuring the appropriate amount of a partial distribution based on a party's past record and for assuring the Library of Congress that the recipient of the funds has the ability to repay any amount over-advanced. In short, MGC's technocratic insistence that Devotional Claimants be denied a share of partial distribution of 2015 Satellite Funds, because they are not "established claimants," ignores reality and precedent, and would run directly contrary to the statutory purpose of facilitating and encouraging settlement. An objection on this basis is unreasonable.

III. Conclusion

MGC's Objection fails to state any reasonable ground to deny the Motion. First, the identity of the Devotional Claimants is known, or readily capable of being known, to MGC. As acknowledged herein, the Devotional Claimants are fully capable of repaying any overage advanced by partial distribution (plus interest) based on a final award. Second, the Devotional Claimants have received final awards in uncontested proceedings from the inception of the statutory satellite license through 1998, partial awards from 1999-2014, and 100% of the contested satellite royalties in the Devotional category for 2008. The Motion for partial distribution of 2015 Satellite Funds should be granted.

Respectfully submitted,

DEVOTIONAL CLAIMANTS

/s/ Matthew J. MacLean

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October 30, 2017

Certificate of Service

I hereby certify that on this 30th day of October, 2017, a copy of the foregoing Devotional Claimants Reply to Multigroup Claimants' Objection to Partial Distribution of 2015 Satellite Royalty Funds to Certain "Allocation Phase Parties" was sent electronically by eCRB or via overnight mail to the parties listed below:

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/s/ Matthew J. MacLean
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EXHIBIT 1

No.	Filer's Name	Filer's City	Filer's State	Date
1	WNBA Enterprises LLC	Potomac	MD	7/1/2016
2	John F. Kennedy Center for the Performing Arts	Washington	DC	7/1/2016
3	KATC Communications LLC	Lafayette	LA	7/1/2016
4	WPSD-TV LLC	Paducah	KY	7/1/2016
5	National Hockey League	Potomac	MD	7/1/2016
6	National Basketball Association (non-game)	Potomac	MD	7/1/2016
7	Guthy-Renker LLC	Potomac	MD	7/1/2016
8	United States Golf Association (USGA)	Potomac	MD	7/1/2016
9	NASCAR Media Group	Potomac	MD	7/1/2016
10	Ladies Professional Golfers Association	Potomac	MD	7/1/2016
11	Intersport	Potomac	MD	7/1/2016
12	GB Entertainment LLC	Potomac	MD	7/1/2016
13	Augusta National Golf Club (the masters)	Potomac	MD	7/1/2016
14	NFL Productions LLC	Potomac	MD	7/1/2016
15	National Football League	Potomac	MD	7/1/2016
16	NBA Enterprises LLC	Potomac	MD	7/1/2016
17	National Basketball Association	Potomac	MD	7/1/2016
18	Hammerman PLLC dba Intermediary (2015 Gray TV Satellite); Gary Television Inc	Washington	DC	7/1/2016
19	(JOINT) NBCUniversal Media LLC	New York	NY	7/1/2016
20	(JOINT) Hammerman PLLC dba Intermediary (2015 Program Suppliers Joint Satellite)	Washington	DC	7/1/2016
21	(JOINT) Hammerman PLLC dba Intermediary (2015 Devotional Joint Satellite)	Washington	DC	7/1/2016
22	Direct Delivery Specialists	Los Angeles	CA	7/4/2016
23	Murad LLC	Los Angeles	CA	7/4/2016
24	Left blank intentionally			
25	CF Entertainment Inc	Beverly Hills	CA	7/5/2016
26	The Weather Channel; Weather Group Television LLC	Atlanta	GA	7/5/2016
27	WBDT Television LLC on behalf of WBDT-TV	Indianapolis	IN	7/5/2016
28	LIN Television Corporation on behalf of WISH-TV	Indianapolis	IN	7/5/2016
29	Lee Mendelson Film Productions Inc; Peanuts WorldWide LLC	Burlingame	CA	7/5/2016
30	Carsey-Werner Distribution	Encino	CA	7/5/2016
31	Manhan Media Inc	Columbus	OH	7/5/2016
32	Columbus (WTTE-TV) Licensee Inc	Columbus	OH	7/5/2016
33	Left blank intentionally			
34	WSYX Licensee Inc	Columbus	OH	7/5/2016
35	Left blank intentionally			
36	WMC Holdings LLC; Raycom Media Inc	Memphis	TN	7/5/2016
37	Left blank intentionally			
38	KCBD LLC; Raycom TV Broadcasting Inc	Lubbock	TX	7/5/2016

No.	Filer's Name	Filer's City	Filer's State	Date
39	Mt. Mansfield Television Inc licensee of WCAZ-TV	Burlington	VT	7/5/2016
40	WLFL Licensee LLC	Raleigh	NC	7/6/2016
41	ITV Studios Inc; Upper Ground Enterprises	Sherman Oaks	CA	7/6/2016
42	National Film Board of Canada	Montreal	QC	7/6/2016
43	Broadcast Music Inc	New York	NY	7/6/2016
44	Vine Library Company LP	New York	NY	7/6/2016
45	(JOINT) Audio Visual Copyright Society Limited (trading as Screenrights)	NSW	Australia	7/3/2016
46	(JOINT) CBS Studios Inc, a CBS Company	Santa Monica	CA	7/6/2016
47	Left blank intentionally			
48	(JOINT) CBS Broadcasting Inc	New York	NY	7/7/2016
49	David Powell	Miami	FL	7/7/2016
50	(JOINT) Metro-Goldwyn-Mayer Studios Inc	Beverly Hills	CA	7/7/2016
51	(JOINT) Compact Collections Limited	London	UK	7/8/2016
52	WRC-TV, NBC Subsidiary LLC	Washington	DC	7/8/2016
53	WNBC, NBC Universal Media LLC	New York	NY	7/8/2016
54	Hearst Entertainment Inc	New York	NY	7/8/2016
55	KSLA LLC	Shreveport	LA	7/11/2016
56	Left blank intentionally			
57	Left blank intentionally			
58	Media General Holdings LLC	Richmond	VA	7/11/2016
59	WNBC, NBC Universal Media LLC	New York	NY	7/11/2016
60	WTVH Licensee Inc dba WTVH (TV); Sinclair Communications LLC	Syracuse	NY	7/11/2016
61	American Society of Composers, Authors, and Publishers	New York	NY	7/11/2016
62	(JOINT) Fox Entertainment Group Inc	Los Angeles	CA	7/15/2016
63	WNYT-TV LLC, Licensee of WNYT-TV	St. Paul	MN	7/15/2016
64	WHEC-TV LLC, Licensee of WHEC-TV	St. Paul	MN	7/15/2016
65	KSTP-TV LLC, Licensee if KSTP-TV	St. Paul	MN	7/15/2016
66	Steve Rotfeld Productions Inc	Bryn Mawr	PA	7/15/2016
67	(JOINT) MG Perin Inc	New York	NY	7/13/2016
68	International Management Group/Transworld International	Potomac	MD	7/12/2016
69	IMG Inc (International Management Group)	Potomac	MD	7/12/2016
70	(JOINT) SAG-AFTRA	Los Angeles	CA	7/13/2016
71	Left blank intentionally			
72	San Antonio Television LLC	San Antonio	TX	7/14/2016
73	Left blank intentionally			
74	Left blank intentionally			
75	Left blank intentionally			
76	Ruth Fowler	New York	NY	7/14/2016

No.	Filer's Name	Filer's City	Filer's State	Date
77	Sinclair Broadcast Group Inc, Licensee of WCHS	Charleston	WV	7/14/2016
78	Pacific Family Entertainment	Santa Ana	CA	7/19/2016
79	Oliver Productions Inc	Washington	DC	7/19/2016
80	BBC Worldwide Americas Inc	New York	NY	7/19/2016
81	(JOINT) The Goodman Group LLC	Mars	PA	7/20/2016
82	Ring of Honor Wrestling Entertainment LLC	Hunt Valley	MD	7/20/2016
83	Sinclair Broadcast Group Inc d/b/a Full Measure with Sharyl Attkisson	Hunt Valley	MD	7/20/2016
84	KENS-TV Inc	San Antonio	TX	7/20/2016
85	(JOINT) Gammon & Grange PC	McLean	VA	7/20/2016
86	Sinclair Broadcast Group Inc, Licensee of KHGI	Hunt Valley	MD	7/21/2016
87	Left blank intentionally			
88	Howard Stirk Holdings Licensee WEYI-TV; Sinclair Broadcast Group	Cilo	MI	7/21/2016
89	Meredith Corporation, Licensee of KCTV	Fairway	KS	7/21/2016
90	Ivy Classics Inc	Asheville	NC	7/21/2016
91	(JOINT) Ole Media Management LP	Toronto	ON	7/21/2016
92	SFM Entertainment LLC: Fred Rapport	Rye Brook	NY	7/21/2016
93	Babe Winkelman Productions Inc	Baxter	MN	7/21/2016
94	Left blank intentionally			
95	(JOINT) Jacqueline Eddy c/o Disney	Burbank	CA	7/21/2016
96	(JOINT) ENTIDAD DE GESTION DE DERECHOS DE LOS PRODUCTORES AUDIOVISUALES	Madrid	Spain	7/22/2016
97	(JOINT) 560 Media Rights Limited	Harpenden	UK	7/22/2016
98	(JOINT) IFTA Collections, a division of the Independent Film & Television Alliance	Los Angeles	CA	7/22/2016
99	Tribune Television, New Orleans Inc (for station WNOL-TV)	Metairie	LA	7/22/2016
100	(JOINT) Marty Stouffer Productions Ltd	Carbondale	CO	7/22/2016
101	KNBC, Subsidiary of NBCUniversal Media LLC	Universal City	CA	7/22/2016
102	Sinclair Broadcast Group Inc (for KXVO)	Omaha	NE	7/22/2016
103	BBMA Holdings LLC	Santa Monica	CA	7/22/2016
104	The Christian Broadcasting Network Inc	Virginia Beach	VA	7/22/2016
105	DCP Rights LLC	Santa Monica	CA	7/22/2016
106	(JOINT) All Global Media LLC	Santa Monica	CA	7/22/2016
107	Dick Clark Productions Inc	Santa Monica	CA	7/22/2016
108	(JOINT) Arnold P. Lutzker	Washington	DC	7/22/2016
109	WPIX LLC	New York	NY	7/25/2016
110	WBNS-TV, Licensee of Television Station WBNS-TV	Columbus	OH	7/25/2016
111	KFVS License Subsidiary LLC dba KFVS-TV	Cape Girardeau	MO	7/25/2016
112	Zuffa LLC	Las Vegas	NV	7/25/2016
113	Automobile Club of Southern California	Costa Mesa	CA	7/25/2016

No.	Filer's Name	Filer's City	Filer's State	Date
114	Fox Television Stations LLC, Licensee of KTTV	Washington	DC	7/25/2016
115	Fox Television Stations LLC, Licensee of WWOR-TV	Washington	DC	7/25/2016
116	Fox Television Stations LLC, Licensee of WNYW	Washington	DC	7/25/2016
117	(JOINT) Univision Communications Inc	Los Angeles	CA	7/25/2016
118	VideolIndiana Inc, Licensee of Television Station WTHR TV	Indianapolis	IN	7/25/2016
119	Litton Syndications Inc	Mount Pleasant	SC	7/25/2016
120	WREG LLC	Memphis	TN	7/26/2016
121	WGN Continental Broadcasting Company LLC	Chicago	IL	7/26/2016
122	Connection III Entertainment Corp	Los Angeles	CA	7/26/2016
123	Viacom International Inc	New York	NY	7/26/2016
124	Screen Media Ventures LLC	New York	NY	7/26/2016
125	Office of the Commissioner of Baseball (on it's on behalf of the thirty Major League Baseball clubs identified in the Attachment	New York	NY	7/26/2016
126	Gregory H. Guillot; Word of God Fellowship Inc dba Daystar Television Network	Dallas	TX	7/26/2016
127	(JOINT) Roxanne Modjallal	Burbank	CA	7/26/2016
128	Hearst Properties Inc, on behalf of WXII-TV	New York	NY	7/27/2016
129	WDCW LLC	Washington	DC	7/27/2016
130	Hearst Stations Inc, Licensee of WPTZ(TV)	New York	NY	7/27/2016
131	Hearst Properties Inc, on behalf of WMUR-TV	New York	NY	7/27/2016
132	(JOINT) AMERICAN BROADCASTING COMPANIES INC	New York	NY	7/27/2016
133	Hearst Stations Inc, Licensee of WBAL-TV	New York	NY	7/27/2016
134	WAPT Hearst Television Inc, Licensee of WAPT-TV	New York	NY	7/27/2016
135	RIGHT THIS MINUTE LLC	Phoenix	AZ	7/27/2016
136	Mark Gerard Obrien	Newport Beach	CA	7/27/2016
137	Television Wisconsin Inc	Madison	WI	7/27/2016
138	Academy of Motion Picture Arts and Sciences	Beverly Hills	CA	7/27/2016
139	WLBT LLC	Jackson	MS	7/27/2016
140	(JOINT) Endemol Shine Group B.V.	AC	Amsterdam	7/27/2016
141	KTLA LLC	Los Angeles	CA	7/28/2016
142	Tribune Entertainment Company LLC	Chicago	IL	7/28/2016
143	GRAHAM MEDIA GROUP FLORIDA INC	Jacksonville	FL	7/28/2016
144	Esteem Broadcasting of North Carolina LLC	New Bern	NC	7/28/2016
145	Left blank intentionally			
146	Left blank intentionally			
147	Left blank intentionally			
148	North Carolina License Holdings Inc	New Bern	NC	7/28/2016
149	Left blank intentionally			
150	KLFY L.P.	Richmond	VA	7/28/2016

No.	Filer's Name	Filer's City	Filer's State	Date
151	Bangor Communications LLC	Bangor	MA	7/28/2016
152	Cox Media Group Northeast LLC	Memphis	TN	7/28/2016
153	Media General Communications Holdings LLC, on behalf of WJTV	Richmond	VA	7/29/2016
154	Tanana Valley Television Company, Licensee of K13XD-D	Fairbanks	AK	7/29/2016
155	Tanana Valley Television Company, Licensee of KFXF(TV)	Fairbanks	AK	7/29/2016
156	Winston Broadcasting Network Inc, Licensee of WBNX-TV	Cuyahoga Falls	OH	7/29/2016
157	FreemantleMedia North America Inc	Burbank	CA	7/29/2016
158	WAFF License Subsidiary LLC	Montgomery	AL	7/29/2016
159	Kimberly Franklin	Wilmington	NC	7/29/2016
160	(JOINT) Jonathan T McCants LLC	Atlanta	GA	7/29/2016
161	KLCS-TV	Los Angeles	CA	7/29/2016
162	(JOINT) COMPACT	London	UK	7/29/2016
163	Elizabeth Gantt	Maçon	GA	7/29/2016
164	Hearst Stations Inc, Licensee of WNNE(TV)	New York	NY	7/29/2016
165	WSJV License LLC, Licensee of WSJV(TV)	Quincy	IL	7/29/2016
166	WBNG License LLC, Licensee of WBNG-TV	Quincy	IL	7/29/2016
167	WAOW-WYOW License LLC, Licensee of WYOW(TV)	Quincy	IL	7/29/2016
168	WAOW-WYOW License LLC, Licensee of WAOW(TV)	Quincy	IL	7/29/2016
169	Monica L. Dias; Scripps Broadcasting Holdings LLC, Licensee of WACY-TV	Cincinnati	OH	7/31/2016
170	Monica L. Dias; Scripps Broadcasting Holdings LLC, Licensee of WGBA-TV	Cincinnati	OH	7/31/2016
171	Monica L. Dias; Scripps Broadcasting Holdings LLC, Licensee of WTMJ-TV	Cincinnati	OH	7/31/2016
172	Monica L. Dias; Scripps Broadcasting Holdings LLC, Licensee of WFTX-TV	Cincinnati	OH	7/31/2016
173	Monica L. Dias; Newschannel 5 Network LLC, Licensee of WTVF c/o Scripps Media Inc	Cincinnati	OH	7/31/2016
174	Monica L. Dias; Scripps Media Inc, Licensee of KNXV-TV	Cincinnati	OH	7/31/2016
175	Monica L. Dias; Scripps Media Inc, Licensee of WXYZ-TV	Cincinnati	OH	7/31/2016
176	Monica L. Dias; Scripps Media Inc, Licensee of WMYD	Cincinnati	OH	7/31/2016
177	Monica L. Dias; Scripps Media Inc, Licensee of WRTV	Cincinnati	OH	7/31/2016
178	Monica L. Dias; Scripps Media Inc, Licensee of KMCI-TV	Cincinnati	OH	7/31/2016
179	Monica L. Dias; Scripps Media Inc, Licensee of KSHB-TV	Cincinnati	OH	7/31/2016
180	Graham Media Group, San Antonio Inc	San Antonio	TX	8/1/2016

No.	Filer's Name	Filer's City	Filer's State	Date
181	(JOINT) TEGNA Inc	McLean	VA	8/1/2016
182	(JOINT) National Collegiate Athletic Association	Indianapolis	IN	8/1/2016
183	CNBC LLC	Englewood Cliffs	NJ	8/1/2016
184	Tribune Broadcasting Indianapolis LLC (for station WXIN)	Indianapolis	IN	8/1/2016
185	KWGN LLC	Denver	CO	8/1/2016
186	EMI Music Publishing	London	UK	8/1/2016
187	Nexstar Broadcasting Inc, Licensee of WLMT	Irving	TX	8/1/2016
188	Knight Broadcasting of Baton Rouge Inc, Licensee of WVLA	Lafayette	LA	8/1/2016
189	Mission Broadcasting Inc, Licensee of WVNY	West Lake	OH	8/1/2016
190	USA Track & Field Inc	Indianapolis	IN	8/1/2016
191	Left blank intentionally			
192	Nexstar Broadcasting Inc, Licensee of WFFF	Irving	TX	8/1/2016
193	WBOY-TV LLC; West Virginia Media Holdings LLC, Licensee of WBOY-TV	Clarksburg	WV	8/1/2016
194	(JOINT) SESAC Inc	Nashville	TN	7/29/2016
195	(JOINT) Multigroup Claimants	Los Angeles	CA	7/25/2016
196	Telco Productions Inc	Santa Monica	CA	7/18/2016
197	Califon Productions Inc	Culver City	CA	7/20/2016
198	Jeopardy Productions Inc	Culver City	CA	7/20/2016
199	(JOINT) Sony Pictures Television Inc	Culver City	CA	7/20/2016
200	Scholastic Entertainment Inc (amended)	New York	NY	7/14/2016
201	Stephen J. Cannell Productions Inc (amended)	West Hollywood	CA	7/11/2016
202	KATC Communications LLC (amended)	Lafayette	LA	7/1/2016
203	Louisiana Television Broadcasting LLC, Licensee of WBRZ-TV (amended)	Baton Rouge	LA	7/21/2016
204	Professional Golfers Association of America (PGA)	Potomac	MD	7/1/2016

EXHIBIT 2

Claim Number	Entity filing claim	Claimants
21	Hammerman PLLC dba Intermediary (2015 Devotional Joint Satellite)	American Religious Town Hall, Inc. Billy Graham Evangelistic Association Crenshaw Christian Center It Is Written John Hagee Ministries, Inc., Joyce Meyer Ministries, Inc. Kerry Shook Ministries Lakewood Church/Joel Osteen Ministries
104	The Christian Broadcasting Network, Inc.	The Christian Broadcasting Network, Inc.
108	Arnold P. Lutzker (Joint)	Crystal Cathedral Ministries, Inc. Living Church of God (International), Inc. Living Word Christian Center, aka Bill Winston Ministries Philadelphia Church of God, Inc. Messianic Vision, Inc. Christian Television Corporation WCLF-TV, Christian Television Corporation, Inc. WRXY, West Coast Christian Television, Inc. WHTN-TV, Christian Television Network, Inc. WHBR-TV, Christian Television of Pensacola/Mobile, Inc. KNLJ-TV, Christian Television Network Inc. KFXB-TV, Christian Television of Iowa, Inc. WVUP-TV, Christian Television Corporation, Inc. WFGC-TV, Christian Television of Palm Beach County, Inc. WVLR-TV, Volunteer Christian Television, Inc. WLCN-TV, Christian Television Network of South Carolina, Inc. WYBU-TV, Christian Television Network, Inc. WEPH-TV, Christian Television Network Of Mississippi, Inc. WTJR-TV, Christian Television Network, Inc. WLCF-TV, Christian Television Network, Inc. WGNM-TV, Christian Television Network, Inc.
126	Gregory H. Guillot; Word of God Fellowship Inc. dba Daystar Television Network	Daystar Television Network
160	Jonathan T. McCants LLC	In Touch Ministries, Inc. Turning Point for God

Certificate of Service

I hereby certify that on Monday, October 30, 2017 I provided a true and correct copy of the Notice - Other to the following:

Multigroup Claimants, represented by Brian D Boydston served via Electronic Service at brianb@ix.netcom.com

Broadcaster Claimants Group, represented by Brendan Sepulveda served via Electronic Service at bsepulveda@crowell.com

Program Suppliers, represented by Gregory O Olaniran served via Electronic Service at goo@msk.com

Broadcast Music, Inc. (BMI), represented by Brian A Coleman served via Electronic Service at Brian.Coleman@dbr.com

Joint Sports Claimants, represented by Michael S Laane served via Electronic Service at sean.laane@apks.com

SESAC, Inc., represented by John C. Beiter served via Electronic Service at jbeiter@lsglegal.com

Powell, David, represented by david powell served via Electronic Service at davidpowell008@yahoo.com

American Society of Composers, Authors and Publishers (ASCAP), represented by Sam Mosenkis served via Electronic Service at smosenkis@ascap.com

Signed: /s/ Matthew J MacLean